

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Case No. 1:25-bk-00096-HWV
MARY-JO A. METAXAS,	:	
	:	
Debtor.	:	Chapter 13
<hr style="width: 35%; margin-left: 0;"/>	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Pro. No. 1:25-ap-00016-HWV
	:	
MARY-JO A. METAXAS,	:	
	:	
Defendant.	:	

**STIPULATION FOR JUDGMENT ON NON-DISCHARGEABILITY OF
DEFENDANT’S DEBT TO THE SOCIAL SECURITY ADMINISTRATION**

The undersigned parties, by their attorneys, hereby resolve the Complaint to Determine Dischargeability of Debt (“Complaint”) filed by the United States on March 26, 2025. (Adversary Proceeding Doc. 1).

1. In the Complaint, the Social Security Administration (“SSA”) objected to the discharge of a debt owed by Defendant to SSA on the ground that she incurred it through false pretenses, a false representation, or actual fraud.

2. The parties agree that this debt, in the amount of \$39,962.00, is a non-dischargeable debt pursuant to 11 U.S.C. § 523(a)(2)(A), in the current bankruptcy case or any future bankruptcy case. The parties agree and stipulate to an entry of judgment for the United States of America, on behalf of SSA, for \$39,962.00.

3. SSA shall not charge Defendant any interest, costs, or fees relating to this debt.

4. Plaintiff and Defendant will bear their own fees and costs in this action.

5. This Stipulation shall be in full settlement of the allegations of this adversary proceeding. This Stipulation does not address any other matters that may involve Defendant and the United States or any of its agencies, including but not limited to, any and all other civil, tax, and/or criminal matters.

6. This Stipulation constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or agents of either party, that is not contained in this written Stipulation, shall be enforceable.

Dated: March 26, 2025

Respectfully submitted,

JOHN C. GURGANUS
Acting United States Attorney

MARY-JO A. METAXAS
Defendant

/s/ Ryann D. Loftus
RYANN D. LOFTUS
Assistant United States Attorney
United States Attorney's Office
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/s/ Brad J. Sadek
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Debtor.	:	Chapter 13
_____	:	
	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
vi.	:	Adv. Pro. No. _____
	:	
MARY-JO A. METAXAS,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania, and is a person of such age and discretion as to be competent to serve papers.

That on March 26, 2025, she served a copy of the attached:

**STIPULATION FOR JUDGMENT ON NON-DISCHARGEABILITY OF
DEFENDANT'S DEBT TO THE SOCIAL SECURITY ADMINISTRATION**

by electronic mail to:

Brad J. Sadek
Sadek Law Offices, LLC
1500 JFK Boulevard
Suite 220
Philadelphia, PA 19102
215-545-0008
brad@sadeklaw.com

/s/ Bethany Haase
BETHANY HAASE
Paralegal Specialist